

# Changes in Documentation for the CRA



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*Presented to the*  
Environmental Protection Agency

Steve Kouba

Washington Regulatory and Environmental Services

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# Overview of Presentation

- Comparison of Changes
- CRA Format & Content
- Technical Changes *(by Chapter)*
- Notifications of Planned Changes
  - Summary
  - Annual Change Report History
  - Individual Submissions



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# Documentation Changes between the Documents:

- Both have nine chapters
- The CRA has added, combined, deleted, as appropriate, CCA appendices
- EPA concurrence
- The changes are not significant to long-term repository performance per 40 CFR 194.4(b)(3)

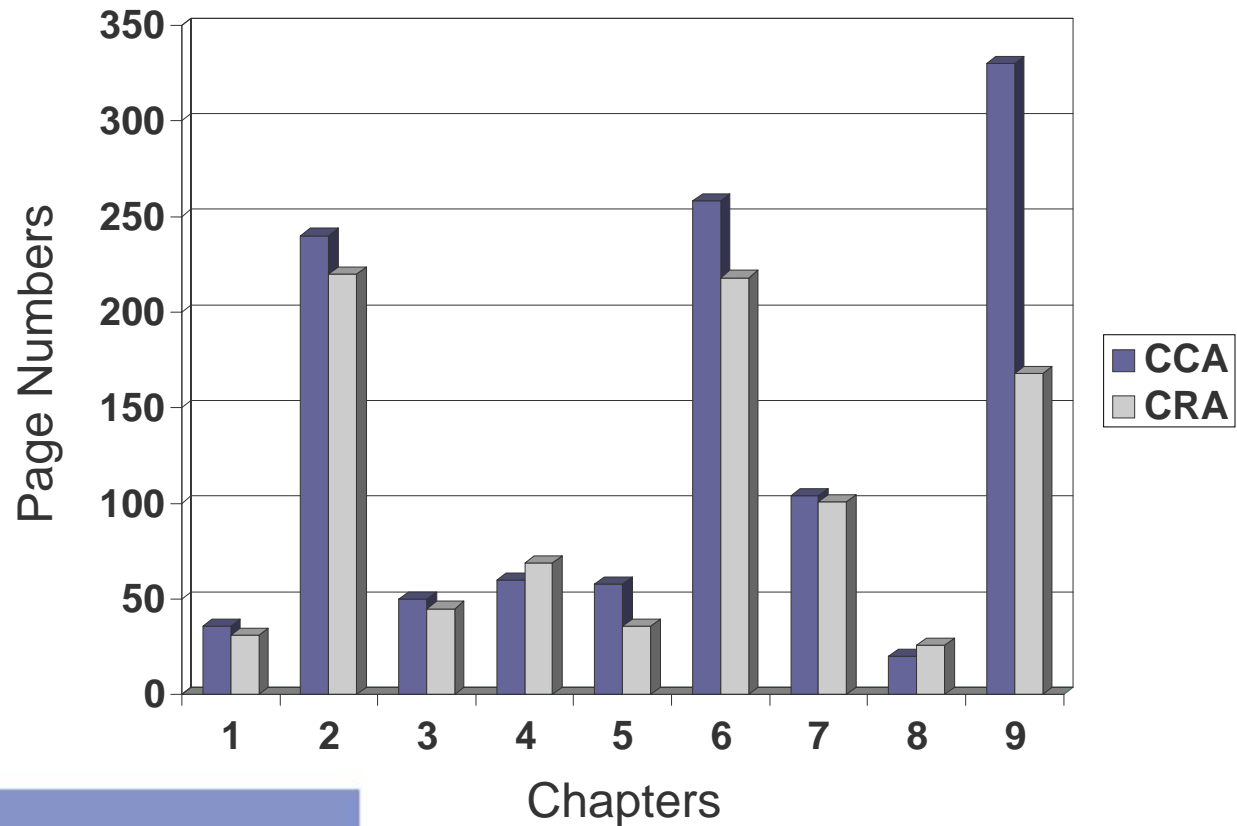


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# CCA versus CRA

## *Page count by chapter*

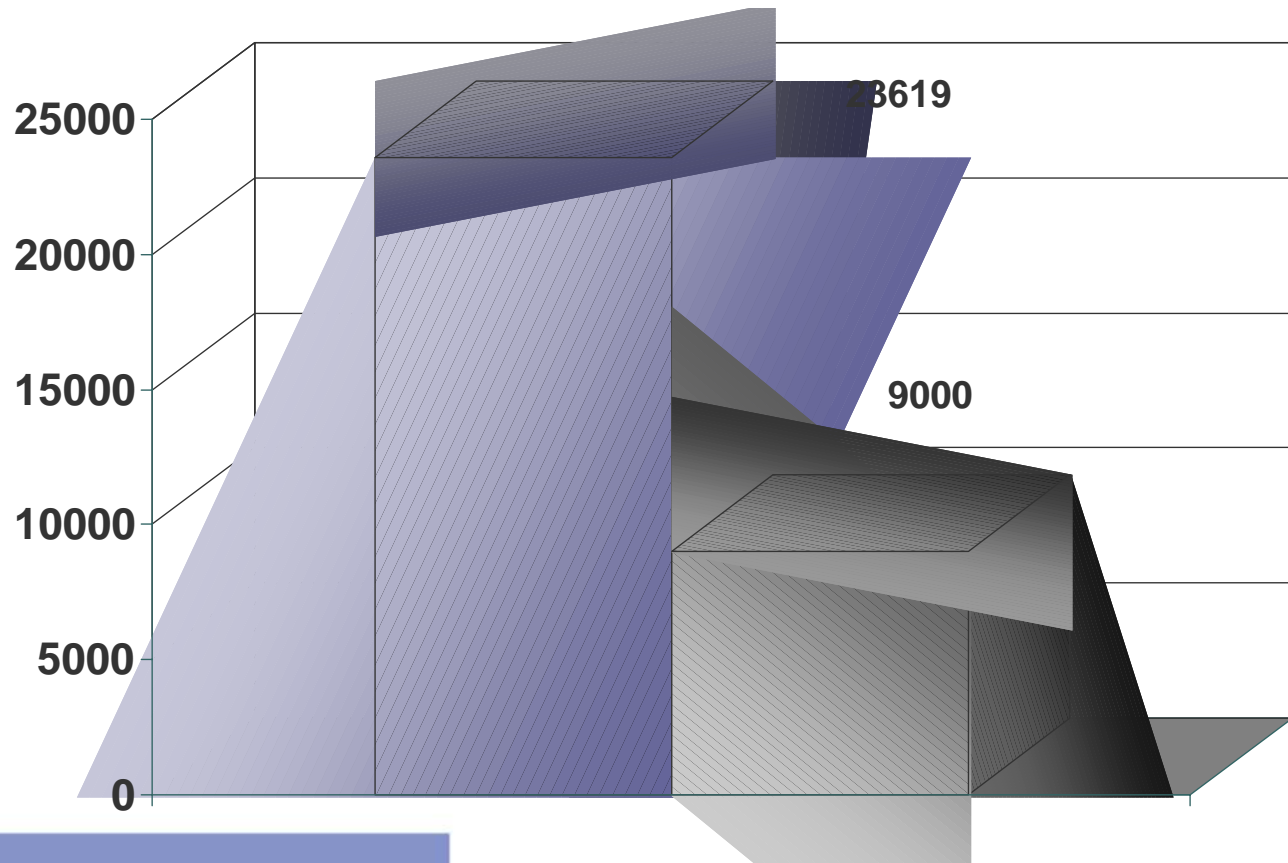


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# CCA versus CRA

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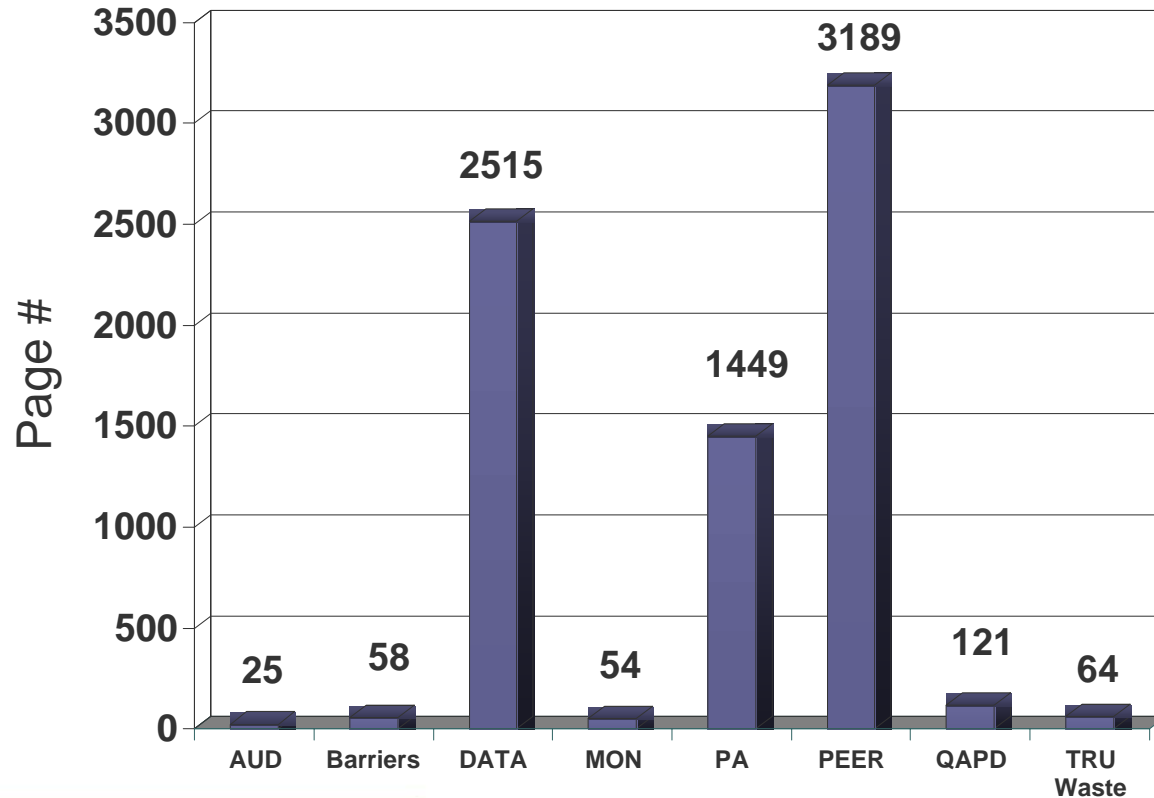


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# CRA Appendices

*Page count*



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# References

- CCA – 716 total
- CRA - 211 new references
- Of the 211 new references:
  - 138 were provided in hard copy
  - Remaining 73 not provided (in EPA Docket or referenced in the CCA)



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# CRA Format & Content

## *Guidance & Correspondence*

- EPA's Dec 2000 Recertification Guidance
  - “. . . Include any new information related to the disposal system that was obtained during the five-year period after emplacement of the waste began . . .”
- CRA meets the “content” requirements of 40 CFR 194.15
- Meetings and numerous correspondence between EPA and DOE



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# CRA Format & Content

## *Guidance & Correspondence*

- April 22, 2003 Carlsbad meeting
  - Agreed to modified *strikeout*, ***bold blue italics*** format
- Chapters 1, 5, 6, and 9 are considered completely revised, thus all text is in ***bold blue italics***
- A new baseline can be generated after EPA recertifies WIPP



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# CRA Format & Content

## *Guidance & Correspondence*

- July 24, 2003 Triay to Marcinowski letter – DOE proposes five categories of change
  - Major text revision
  - Minor text revision
  - CCA Appendix Incorporated by Reference
  - CCA Appendix Eliminated
  - New Additions

*Seven page table details the specifics of the changes*



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# CRA Format & Content

## *Guidance & Correspondence*

- September 17, 2003 Marcinowski to Triay letter – “. . . (DOE) proposal fulfills and even exceeds . . . Recertification Guidance . . .”



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# Technical Changes Going from the CCA to the CRA

- Chapter 1, Overview
  - Complete rewrite, summary of changes and conclusions



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# Technical Changes Going from the CCA to the CRA

- Chapter 2, Site Characterization
  - Updates to characterization from monitoring and modeling activities
- Associated Appendices
  - PA Attachments MASS, SCR, TFIELD
  - DATA



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# Technical Changes Going from the CCA to the CRA

- Chapter 3, Facility Description
  - Change of the mining horizon to Clay Seam G
  - Panel 1 utilization
  - Eliminate use of MgO mini-sacks
- Associated Appendix
  - Barriers



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# Technical Changes Going from the CCA to the CRA

- Chapter 4, Waste Description –
  - Updates to stored, projected, scaled and emplaced inventories
  - Changes Related to Waste Characterization
- Associated Appendix
  - TRU Waste



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# Technical Changes Going from the CCA to the CRA

- Chapter 5, Quality Assurance
  - Complete rewrite, incorporates program changes made since CCA
- Associated Appendices
  - AUD - Summary of Assessments
  - QAPD



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# Technical Changes Going from the CCA to the CRA

- Chapter 6, Containment Requirements
  - Identifies changes which may affect the PA system
  - Presents the results of the PA that appropriately address these changes
- Associated Appendix
  - Appendix PA and its attachments MASS, SCR, SOTERM, TFIELD, PORSURF and PAR



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# Technical Changes Going from the CCA to the CRA

- Chapter 7, Assurance Requirements
  - Status of programmatic changes affecting assurance requirements
- Associated Appendices
  - MON
  - BARRIERS
  - DATA



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# Technical Changes Going from the CCA to the CRA

- Chapter 8, Individual & Groundwater Protection Requirements
  - Updates to monitoring and modeling activities



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# Technical Changes Going from the CCA to the CRA

- Chapter 9, Peer Review
  - Complete rewrite, new and revised peer reviews
- Associated Appendix
  - PEER



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# Notifications of Planned Changes

- Notification of Planned Changes have been made outside of the Annual Change Report (*see following slides*)
- No approved changes to date, have been deemed significant by EPA



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# History of Annual Report Submittals

Reporting Period	EPA Approval Date	Comments
9/16/97 -- 9/15/98	6/3/99	A-98-49, II-B-3, Item 3
9/16/98 – 9/15/99	2/24/00	A-98-49, II-B-3, Item 11
9/16/99 – 9/15/00	7/2/01	A-98-49, II-B-3, Item 26
9/16/00 – 9/15/01	6/13/02	A-98-49, II-B-3, Item 32
9/16/01 – 9/15/02	8/8/03	
9/16/02 – 6/30/03	Pending	Revised reporting period
7/01/03 – 6/30/04	Not submitted	Future submittals follow this reporting period



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# Written Notification of Change Topic, EPA Approval Date, Docket Reference

- Change mining horizon to Clay Seam G for panels 3, 4, 5, 6, and 9.
  - 8/11/00 (A-98-49, II-A-3, Item 24)
- Eliminate MgO mini sacks
  - 1/11/01 (A-98-49, II-B-3, Item 15)



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# Written Notification of Change

*Topic, EPA Approval Date, Docket Reference*

- Conduct Majorana Project U/G experiments
  - Approved 1/29/02 (A-98-49, II-B-3, Item 21)
  - Subsequent name change to Sega/Mega
  - Approved 6/11/03 (A-98-49, II-B-3, Item 55)
- Characterize “newly generated waste” using NDE
  - Approved 4/15/03 (A-98-48, II-B-3, Item 49)



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# Written Notification of Change

*Topic, EPA Approval Date, Docket Reference*

- Use of single parameter set in future Performance Assessments
  - 6/17/02 (A-98-49, II-B-3, Item 30)
- Approval of the PICs schedule change
  - 11/7/02 (A-98-49, II-B-3, Item 41)
- Construction of 12 foot mortared concrete block wall and extension of closure schedule
  - 12/26/02 (A-98-49, II-B-3, Item 44)



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# Written Notification of Change

*Topic, EPA Approval Date, Docket Reference*

- Disposal of classified TRU waste
  - 2/11/03 (A-98-49, II-B-3, Item 45)
  - 4/8/03 (A-98-49, II-B-3, Item 47)
- Approval to dispose AMWTF uncompacted (uncompressed) non-debris waste
  - 6/11/03 (A-98-49, II-B-3, Item 56)



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# Written Notification of Change

*Topic, EPA Approval Date, Docket Reference*

- Approval of Phase 1 of the Enriched Xenon Observatory (EXO) Experiment in the WIPP underground
  - 2/4/04
- Approval to dispose super-compacted waste from INEEL's AMWTF
  - 3/26/04



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# Written Notification of Change

*Topic, EPA Approval Date, Docket Reference*

- Approval of RH TRU Waste Characterization Program Implementation Plan
  - 3/26/04
- Modify RTR and VE programs consistent with Section 311 of the Energy and Water Development Appropriations Act, 2004
  - Pending



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# Summary of Changes

- Streamlined the application
- Facilitates the regulatory process
- Received EPA input and approval
- Summary of planned changes presented in six Annual Change Reports



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